

In the Matter of)
)
Requests for Waiver and appeal of)
Decisions of the)
Universal Service Administrator by)
)
Ascension Parish School District)
) CC Docket No. 02-6
Schools and Libraries Universal Service)
Support Mechanism)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

May 25, 2017

Request for Waiver of the FCC Form471 Filing Deadline for Funding Year 2015
RE: FCC Form 471 Number: 171049087; Billed Entity Number: 139229, Submitted May 24, 2017

Ascension Parish School District respectfully requests a waiver of the Funding Year 2016 Form 471 deadline for application 171049087.

Ascension Parish experienced a natural disaster in the fall of 2016 which had a severe impact on the district. In some cases there were several feet of water inside school buildings. The water damaged network equipment. It has taken several months to assess the damage and to determine what equipment was needed to replace the damaged items. Ascension Parish School District filed a Form 470 for Category 2 services. The Allowable Contract Date for the Form 470 was May 10, 2017 and the District accompanied the proposals with a Request for response in compliance with Louisiana Title 34, Chapter 17, Section 1709 of the Government Contracts, Procurement and Property Control Part I. Purchasing.

Responses to the procurement were evaluated based solely on price as is specified by this type of procurement. Although the decisions were made by May 11, 2017 the vendors were not notified of the district's decision until after the close of the 2017 filing window. Although this procurement resulted in bids which quoted Louisiana State Master Contract pricing, and although Louisiana does not require a separate agreement between vendors and users of the contracts, E-Rate rules require a legally binding agreement before a Form 471 may be submitted and certified.

Additionally, one of the service providers who received an award, although assigned a Service Provider Identification Number, did not have a current account in EPC at the time of the window close. Therefore the district was unable to associate the appropriate FRN with the vendor's SPIN.

Another administrative issue was the inability to associate some entities with funding requests on the application due to an entity lock down in EPC by USAC.

Application 171049087 was submitted and certified on May 24, 2017 after the purchase orders and award letters were submitted to the winning service providers. By that time, the service provider who was not in EPC had created an account and the district was able to associate their funding request with the correct vendor.

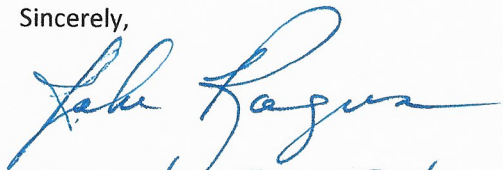
In the Academy for Excellence Order¹ released March 9, 2007 the FCC granted Requests for Waiver of the Form 471 filing deadline for applicants who had missed the filing deadline due to circumstances beyond the applicant's control such as personal circumstances, illness of staff or illness of family members of staff. Other circumstances validated by the FCC in this order include unclear and vague instructions for filing the Form 471, and technical problems.

In the Bishop Perry Order², the Commission found that a slight delay in USAC's receipt of the applications did not warrant complete rejection of the application.

The above mentioned application was submitted and certified within two weeks of the filing deadline for applicants. In previous years, applications submitted and certified within two weeks of the filing window were viewed by the FCC as meeting the definition of "slight delay" as referenced in the Bishop Perry Order above.

We acknowledge the Commission's concern and emphasis on retaining discretion to evaluate each situation on a case-by-case basis and respectfully request your consideration of our request.

Sincerely,


Director IS & Tech
Ascension Public Schools

6/5/2017

¹ Academy for Excellence Order, DA 07-1180, Released March 9, 2007

² Bishop Perry Order, FCC 06-54, Released May 16, 2006